

Austin & Rogers, P.A.

ATTORNEYS AND COUNSELORS AT LAW

WILLIAM FREDERICK AUSTIN
(1930-2016)

TIMOTHY F. ROGERS
RAYMON E. LARK, JR.
RICHARD L. WHITT
EDWARD L. EUBANKS
W. MICHAEL DUNCAN*

COLUMBIA OFFICE
CONGAREE BUILDING
508 HAMPTON STREET, SUITE 203
POST OFFICE BOX 11716 (29211)
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 256-4000
FACSIMILE: (803) 252-3679
WWW.AUSTINROGERSPA.COM

OF COUNSEL:
JEFFERSON D. GRIFFITH, III

* ALSO ADMITTED IN N.C.

September 5, 2018

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: • **Docket 2018-202-E**
• **Support for Interstate Renewable Energy Council, Inc.'s Petition to Intervene**

Dear Ms. Boyd:

The undersigned represents Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, "SCSBA") and Intervenor Ecoplexus, Inc., (hereinafter as, "Ecoplexus") in the above-referenced Docket. I write to provide Notice to this Commission that SCSBA and Ecoplexus support this Commission's approval of the Interstate Renewable Energy Council, Inc.'s, (hereinafter as, "IREC"), Petition to Intervene, e-filed on August 18, 2018, in this Docket.

Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, (hereinafter together as the, "Companies"), e-filed an Objection to IREC's Petition to Intervene. The reasons for the Companies' Objection are not compelling and the Companies' Objection ignores the following ample reasons for this Commission to approve IREC's Petition to Intervene, in this Docket.

FIRST, the Companies' Objection ignores the fact that IREC was granted permission by this Commission to Intervene in the Docket that updated South Carolina Interconnection Procedures, Docket 2015-362-E. IREC participated in the working sessions and meetings in Docket 2015-362-E, which resulted in the Interconnection Procedures of which the Companies now seek a partial waiver. The Companies' Objection asks this Commission to find that it was okay for IREC to participate in the establishment of updated South Carolina Interconnection Procedures, but it is not okay for IREC to participate in a partial waiver of those same Interconnection Procedures.

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SECOND, the Companies' Objection to IREC's Intervention ignores the Public Interest Exception, ATC South, Inc., v. Charleston County, et al., 380 S.C. 191, 669 S.E.2d 337 (2008). IREC's Petition specifically sets forth support for its intervention under the Public Interest Exception in, *inter alia*, paragraphs "6", "7", "8", and "10".

THIRD, the Companies' Objection to IREC's Intervention ignores an important Order of this Commission. That Order provides guidance that, Petitioner, IREC's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No. 2005-725, in Docket No. 2005-270-G, dated December 16, 2005).

In conclusion, IREC's Petition to Intervene in this Docket should be granted (i) because, of the precedent of IREC's participation in the Docket leading to the current South Carolina Interconnection Procedures, of which the Companies seek a partial waiver (ii) IREC's Petition to Intervene sets forth adequate support for the Public Interest Exception in South Carolina, to allow intervention, and (iii) this Commission's previous Order No. 2005-725, establishes this Commission's holding that maximum public participation in a Docket, is appropriate.

Respectfully Submitted,
AUSTIN & ROGERS, P.A.

/s/Richard L. Whitt
Richard L. Whitt,
As Counsel for the South Carolina Solar
Business Alliance, Inc. and Ecoplexus, Inc.

RLW/cas

cc: all parties of record in Docket 2018-202-E, via electronic mail